Compliance audit program

Annual review

January to December 2025

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Executive summary

The Resources Regulator's 2025 Compliance Audit Program demonstrates the effectiveness of a targeted, risk-based regulatory approach aimed at improving compliance, strengthening industry performance, and maintaining community confidence in the management of NSW mining and exploration activities.

During 2025, the Regulator completed 89 audits across exploration and mining operations, including:

- 20 comprehensive exploration audits
- 30 community consultation audits
- 25 risk assessment audits
- 5 rehabilitation sign-off audits
- 9 mining compliance audits of both large and small mining operations.

Guided by a structured risk assessment framework, the program focused regulatory attention on activities with the greatest potential impacts on communities, the environment, and public confidence.

The audit program identified 20 non-compliances, 41 observations of concern, and 117 suggestions for improvement, providing valuable insight into industry performance and highlighting opportunities to strengthen compliance management systems across the sector.

The 20 non-compliances included breaches relating to reporting obligations, community consultation requirements, environmental and rehabilitation management, operational approvals, and sample preservation requirements. Regulatory responses included 16 official cautions and one written direction, with no further enforcement action required for four matters.

While most titleholders demonstrated compliance with key regulatory requirements, the program identified 41 observations of concern that warrant further attention to prevent future non-compliance. The most common issues related to environmental management, risk assessment processes, community consultation practices, and compliance management systems.

A further 117 suggestions for improvement were provided to assist titleholders in enhancing their governance, risk management, documentation, stakeholder engagement, environmental management, and rehabilitation practices. Many recommendations focused on implementing stronger compliance management systems to support proactive identification and management of regulatory obligations.

Overall, the findings indicate that the industry continues to demonstrate a generally positive level of compliance. However, recurring themes in risk assessment, community consultation, environmental management, and rehabilitation planning highlight areas where improved systems, documentation, and oversight are required. The outcomes of the 2025 audit program will inform ongoing regulatory priorities, support continual improvement across the resources sector, and reinforce the Regulator's commitment to transparent, evidence-based regulation that protects communities, landholders, and the environment.

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1. Introduction

1.1. Background

The Resources Regulator's compliance and enforcement framework was designed to ensure a consistent and responsive regulatory approach and to provide increased transparency and community confidence regarding their regulatory activities.

Compliance and enforcement actions are driven by a risk-based approach. A flexible and robust intervention framework is used so the Regulator can apply a variety of increasing enforcement actions to target specific risks or misconduct.

The Regulator promotes voluntary compliance and good practice across the industry. Lease and licence holders are encouraged to demonstrate best practice by actively adopting measures and practices over and above legislative requirements to further minimise potential harms and risks. A key aim of the audit program is to promote continuous improvement in compliance management.

The compliance audit program forms a key part of the compliance and enforcement framework. Audits completed under the program identify non-compliance as well as educate lease and licence holders. This helps to raise awareness of compliance obligations and should enable lease and licence holders to adopt a more proactive approach to managing them.

1.2. Compliance audit program objectives

The objectives of the Regulator's compliance audit program are to:

- assess the level of compliance with the regulatory instruments
- provide internal feedback to improve title conditions, policies or general regulatory framework (protecting and improving system integrity)
- assess auditee performance and provide feedback to them on how they may be able to improve their performance
- increase stakeholder confidence in the regulatory system
- increase the level to which titleholders are actively managing their own compliance.

The compliance audit strategy highlighted the audit schedule and focus for each year would be developed using a risk review process. A risk assessment methodology (broadly based on Australian Standard ISO 31000:2018 Risk management – Guidelines) was used to develop a broad risk profile for each title (or group of titles) to develop the annual audit program. Risk factors used included:

- whether the Regulator had primary regulatory responsibility (e.g. for exploration)
- the type, size and complexity of operations and activities
- the location of activities (environmental sensitivity of surrounding area and proximity of residents)
- results of previous audits and titleholder compliance history
- stakeholder concerns.

The compliance audit strategy and program included a requirement for the annual review of the audit programs against the identified objectives. This report provided the review of the compliance audits completed by the Regulator between 1 January and 31 December 2025.

In 2025, the exploration compliance audit program was identified as a key compliance priority for the Regulator, forming part of the proactive assessment programs documented in our published compliance priorities reports.

1.3. Focus of the 2025 program

In the exploration sector, the 2025 audit program included exploration compliance audits of 20 significant exploration programs. Individual audit reports were written and published on the Regulator's website for each of these 20 audits (hyperlinks are provided in Table 4 in Appendix 1).

Community consultation in exploration was the subject of a targeted audit program in 2025, where 30 exploration programs were subject to a desktop audit against the mandatory requirements of the Exploration code of practice: Community consultation (Community consultation code). Audit findings letters were sent to each licence holder at the completion of each audit. These were not published on the Regulator's website. The findings from the targeted audit program are discussed in this report.

Risk assessment in exploration was the subject of a targeted audit program in 2025, where 25 exploration programs were subject to a desktop audit against the mandatory requirements for risk assessment in the Exploration code of practice: Environmental management (Environmental management code), the Exploration code of practice: Rehabilitation (Rehabilitation code) and the community consultation code. Audit findings letters were sent to each licence holder at the completion of each audit. These were not published on the Regulator's website. The findings from the targeted audit program are discussed in this report.

Rehabilitation sign-off in exploration was the subject of a targeted audit program in 2025, where 5 exploration programs were subject to an audit against the mandatory requirements of the Rehabilitation code, including assessment against the rehabilitation objectives and completion criteria prepared for each project. Audit findings letters were sent to each licence holder at the completion of each audit. These were not published on the Regulator's website. The findings from the targeted audit program are discussed in this report.

In the mining sector, the 2025 compliance audit program included 9 audits of large and small mines against the requirements of the conditions on the mining lease, and the requirements of schedule 8A of the Mining Regulation 2016 (Mining Regulation). Individual audit reports were written and published on the Regulator's website for each of these 9 audits (hyperlinks are provided in Table 4 in Appendix 1).

Details of the sites audited in the 2025 audit program are summarised in Appendix 1. As noted in Appendix 1, the audit scopes varied across the programs. A description of each audit scope is provided in Table 1.

Table 1. Description of audit scopes

Audit scope	Description
Exploration compliance	This audit scope included a compliance assessment against the requirements of the *Mining Act 1992* (Mining Act) and Mining Regulation and the exploration licences issued for the projects. The scope included an assessment of compliance against the requirements of any exploration activity approvals granted for the projects, and the relevant exploration codes of practice, including assessment against the titleholder's commitments in exploration activity approval documentation.
Exploration community consultation	This audit scope included a targeted compliance assessment against the mandatory requirements of the Community consultation code.
Exploration risk assessment	This audit scope included a targeted compliance assessment against the mandatory requirements for risk assessment under the exploration codes of practice: • Environmental management code • Rehabilitation code • Community consultation code
Exploration rehabilitation	This audit scope included a targeted compliance assessment against: • the mandatory requirements of the Rehabilitation code • the rehabilitation objectives and completion criteria prepared for each project in accordance with mandatory requirement 2 of the code • the application for confirmation of successful completion of rehabilitation submitted for each project.
Mining compliance including schedule 8A	This audit scope included an assessment of compliance against the general conditions of mining leases and the standard conditions for mining leases outlined in Schedule 8A Part 2 of the Mining Regulation, including: • Form and way: Rehabilitation management plan (large mines) • Form and way: Annual rehabilitation report and forward program for large mines • Form and way: Annual rehabilitation report and forward program for small mines • Form and way: Rehabilitation objectives, rehabilitation completion criteria for small mines. • Form and way: Rehabilitation objectives, rehabilitation completion criteria and final landform and rehabilitation plan for large mines.

1.4. Publishing and disclosure of information

This report will be published on the Regulator's website consistent with:

- Section 365 of the Mining Act and section 113M of the *Petroleum (Onshore) Act 1991*
- Resources Regulator's Compliance publication policy
- *Government Information (Public Access) Act 2009*.

2. Summary of audit findings

2.1. 2025 audit findings

There were 20 non-compliances, 41 observations of concern and 117 suggestions for improvement identified across the 89 audits included in the 2025 audit program.

The non-compliances generally related to:

- mining (7)
  - failure to publish information in accordance with clause 16 of the Mining Regulation (1)
  - failure to submit exploration reporting for mining leases in accordance with section 163C of the Mining Act (3)
  - failure to obtain approval prior to suspension of mining operations (1)
  - late reporting under clause 15 of the Mining Regulation (2)
- exploration (13)
  - failure to undertake a community consultation risk assessment in accordance with mandatory requirement 1 of the Community consultation code (1)
  - failure to prepare a community consultation strategy in accordance with mandatory requirement 3 of the Community consultation code (4)
  - failure to obtain written consent under section 31 of the Mining Act (1)
  - failure to prepare and submit environmental and rehabilitation compliance report (1)
  - failure to undertake or document a rehabilitation risk assessment in accordance with mandatory requirements 1 and 6 of the Rehabilitation code (2)
  - failure to prepare rehabilitation objectives and completion criteria or a rehabilitation management plan in accordance with mandatory requirement 2 of the Rehabilitation code (2)
  - failure to appropriately manage environmental impacts of exploration in accordance with the requirements of the Environmental management code (1)
  - failure to preserve and maintain representative samples of core or cuttings in accordance with clause 65 of the Mining Regulation (1).

The 20 non-compliances resulted in the issue of 16 official cautions and one written direction. No further enforcement action was taken for 4 non-compliances.

Observations of concern were identified during the audits, which required further management action by the licence or lease holders to avoid becoming non-compliant in the future.

The 41 observations of concern identified included inadequate:

- environmental management in mining operations (10)
- environmental management in exploration operations (5)
- environmental risk assessment in exploration operations (4)
- community consultation risk assessment (4)
- compliance management processes (4)
- community consultation strategy (3)
- rehabilitation risk assessment in exploration operations (3)
- rehabilitation risk assessment in mining operations (3)
- community consultation reporting (1)
- core and sample storage (1)
- forward program for mining operations (1).

Generally, the suggestions for improvement identified during the audits related to the implementation of some form of compliance management system which would assist titleholders to better identify and manage their compliance obligations. Suggestions for improvement included recommendations for improvement of:

- community consultation risk assessment (23)
- risk assessment and management processes (18)
- community consultation reporting (11)
- community consultation strategies (11)
- documentation and record keeping (11)
- environmental risk assessment (9)
- rehabilitation management and performance assessment (9).
- rehabilitation risk assessment (5)

The findings of the 2025 compliance audit program are summarised in Appendix 2.

2.2. Comparison with previous years

The Regulator has been running compliance audit programs for several years. A comparison of the results since January 2020 is presented in Table 2.

Table 2. Comparison of audit statistics 2020-2024

Year	No. audits completed	Non-compliances	Observations of concern	Suggestions for improvement
January 2020 – June 2021	24	10	14	33
July 2021 – December 2022	32	10	48	62
January 2023 – December 2023	38	23	27	71
January 2024 – December 2024	42	8	14	78
January 2025 – December 2025	89	20	41	117

A comparison of the key issues raised in the 2023, 2024 and 2025 audit programs is presented in Table 3. Overall, the results showed a reduction in the number of non-compliances and observations of concern in the exploration sector but an increase in the numbers in the mining sector.

Table 3. Comparison of 2023 and 2024 audit finding key issues

Issue	Non-compliance			Observation of concern			Suggestion for improvement		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Community consultation risk assessment	6	1	1	13	2	4	11	23	24
Community consultation strategy	3	0	4	4	5	3	8	4	12
Community consultation reporting	0	1	0	0	0	1	12	14	11
Environmental risk assessment	3	1	0	0	2	4	0	2	10
Rehabilitation risk assessment	3	2	2	2	2	6	9	9	5
Annual reporting	3	0	6	0	0	0	0	0	1
Risk and compliance management	0	0	0	0	1	4	16	15	28
Environmental management	0	0	1	3	1	15	1	1	1

3. Audit findings – Exploration sector

It was noted about 50% of the non-compliances and observations of concern identified during the exploration audits were related to the mandatory requirements of the exploration codes of practice. For the 2024 audit program, about 75% of the non-compliances and observations of concern related to the mandatory requirements of the codes of practice. The 2025 results demonstrate there has been an increase in awareness of the mandatory requirements of the codes, resulting in fewer non-compliances and observations of concern.

The non-compliances, observations of concern and the suggestions for improvements identified during the 80 exploration audits conducted were broadly grouped into several key areas including:

- community consultation
- environmental management
- rehabilitation
- reporting and other requirements.

These issues will be discussed in the following sections.

3.1. Community consultation

Condition 3 of an exploration licence requires the licence holder to carry out community consultation in relation to the planning and conduct of exploration activities. Community consultation is required to be carried out in accordance with the requirements of Community consultation code.

3.1.1. Risk assessment

Mandatory requirement 1 of the code of practice requires the licence holder to conduct a risk assessment to identify and consider the range of opportunities and potential threats associated with community consultation and engagement.

Community consultation risk assessment was an ongoing issue with licence holders. In 2025, there was one non-compliance for failure to undertake a community consultation risk assessment; the same number reported in 2024. There was an increase in the number of observations of concern related to risk assessment from 2 in 2024 to 4 in 2025. A common suggestion for improvement was for licence holders to review the consultation risk assessments against the objectives for consultation. This would allow the licence holders to identify and focus on the risks that need to be managed for effective and inclusive consultation to take place to achieve the objectives for consultation.

3.1.2. Consultation strategy

Mandatory requirement 2 requires the preparation of a community consultation strategy to manage the risks identified in the risk assessment. Mandatory requirement 3 sets out the requirements for preparation of the community consultation strategy.

In 2024, there were no non-compliances related to the preparation of community consultation strategies. In 2025, there was an increase to 4 non-compliances where licence holders had failed to prepare an adequate consultation strategy that met the mandatory requirements of the code of practice. There were a further 3 licence holders where observations of concern were raised for inadequate consultation strategies.

The most common deficiencies for community consultation strategies related to:

- failure to include a detailed description and analysis of community stakeholders – some strategies included a list of stakeholders but failed to demonstrate an understanding of how those stakeholders may be impacted or what level of information or consultation they required.
- failure to identify appropriate consultation mechanisms to consult with stakeholders – a one-size fits all approach to consultation may not be in the best interests of all stakeholders. Licence holders need to understand the consultation requirements of its community stakeholders and plan appropriate consultation mechanisms for meaningful consultation.
- Failure to identify or inadequate triggers for evaluation and review of the strategy – a consultation strategy should not be a static document. Monitoring and evaluation of the strategy is required to ensure it remains appropriate for the consultation needs of the community.

3.1.3. Implementation and reporting

Mandatory requirement 4 requires the licence holder to implement, monitor and report annually on the community consultation strategy.

Generally, evidence was available to confirm most licence holders were implementing the consultation strategies and reporting annually. There were no non-compliances and only one observation of concern related to implementation and reporting against the community consultation strategy. This represents an improvement from 2024.

Most licence holders were reporting their consultation activities and the results of that consultation. The most common suggestion for improvement was for licence holders to consider undertaking an analysis of any community consultation outcomes and complaints to identify common issues or emerging trends, and documenting this in the annual report.

3.1.4. Revised Exploration code of practice: Community consultation

The Community consultation code was reviewed and revised in 2025 following evaluation of audit findings and feedback from industry. Implementation of the revised code should provide improved mandatory requirements and better guidance to licence holders to address the non-compliances and observations of concern raised during exploration audits over the last few years.

The revised code was effective from 31 March 2026.

3.2. Environmental management

Condition 4 of an exploration licence requires the licence holder to prevent or minimise so far as is reasonably practicable, any harm to the environment arising from the activities carried out under the licence. Condition 2 of an exploration activity approval requires the licence holder to carry out the activity in compliance with Part B of the Environmental management code.

A range of exploration activities were in progress during the audits. Figures 1 to 4 show examples of the types of activities in progress.

Figure 1: Air core drilling

Figure 2: Diamond drilling

Figure 3: Diamond drilling

Figure 4: Costeaning

3.2.1. Risk assessment

Mandatory requirement 12 of the Environmental management code requires the exploration licence holder to monitor the risks associated with those activities and, if the risks associated with an activity change, implement revised environmental management controls.

Mandatory requirement 13 specifies the mandatory records that must be maintained by exploration licence holders. This includes records of risks assessments, and updates to those risk assessments, that result in a significant change to controls required to mitigate impacts to the environment.

All exploration licence holders audited during 2025 had undertaken environmental risk assessments. There were no non-compliances related to environmental risk assessments in 2025, down from one in 2024. Observations of concern increased from 2 in 2024 to 4 in 2025.

Mandatory requirements 1.1 to 11.1 of the code identify the environmental risks typically associated with exploration operations. The risk assessments required under mandatory requirement 12 of the code should assess these risks in the context of the exploration operations on the site and identify suitable controls to be implemented to manage the risks identified.

The key issues identified during audits relating to environmental risk assessments included:

- Risk assessments did not consider all the mandatory elements of the code – in this case, if a risk was not included in the risk assessment, it was not possible to determine if it was not a risk or was not considered. Licence holders should be aligning their environmental risk assessments to the mandatory elements of the code of practice to provide a robust framework for identifying and managing environmental risks.
- Risk controls were brief and did not adequately address the identified risk – controls must relate to and assist with managing the identified risk.
- Use of generic risk assessments for exploration with site specific risks and controls identified in applications for assessable prospecting operations. Splitting risk identification, assessment and management over several documents increases the potential for controls to be missed. Licence holders should consider reviewing the generic risk assessments for each exploration program and consolidating any risks or controls specific to that program into the one document.

3.2.2. Environmental management controls

Most licence holders implemented good environmental management controls during their exploration programs. The exploration drilling programs audited showed implementation of a range of controls including:

- Bunded storages for chemical, fuels and lubricants with spill kits available on site (Figure 5 and Figure 6).
- Use of aboveground sumps for management of water associated with drilling operations (Figure 7).
- Monitoring of noise levels during drilling operations where drilling was near sensitive receptors (Figure 8).
- Erosion and sediment controls installed on sloping sites, with clean water diversions above the drill pad (Figure 9) and sediment fencing below the pad (Figure 10).
- Livestock protection using electric fencing (Figure 10).
- Implementation of weed and seed protocols to manage the introduction and spread of weeds from exploration operations.
- Use of fire trailers, fire extinguishers and fire suppression systems on drill rigs.

Figure 5: Fuels and oils on bunded spill pallet

Figure 6: Spill kit available on site

Figure 7: Use of aboveground sumps for diamond drilling

Figure 8: Noise monitoring equipment on site

Figure 9: Erosion and sediment controls on a drill pad

Figure 10: Electric fencing around drill pad

There was one non-compliance related to environmental management in exploration. This related to poor topsoil management practices affecting rehabilitation of drill pads.

There were 5 observations of concern related to environmental management practices during drilling programs. Three of these related to poor waste management practices, where waste was observed at drill sites. One observation of concern involved the use of a spill kit in a plain, unlabelled green waste bin. The spill kit was fully stocked but the lack of labelling did not make it obvious it was a spill kit. There was one observation of concern related to management of cultural heritage sites. Management controls to protect cultural heritage were implemented but these were not identified in the application for assessable prospecting operations.

3.3. Rehabilitation

3.3.1. Risk assessment

Condition 6 of an exploration licence requires the licence holder to carry out rehabilitation of all disturbance caused by activities carried out under the licence in accordance with the requirements of the Rehabilitation code.

Mandatory requirement 1 of the code requires the licence holder to conduct a risk assessment to evaluate the range of potential threats and opportunities associated with rehabilitating disturbed areas to a condition that could support the intended final land use. Mandatory requirement 6 requires the risk assessment to be documented as a mandatory record.

Most exploration licence holders undertook and documented a rehabilitation risk assessment. There were 2 licence holders who did not have evidence of a documented risk assessment. There were 3 licence holders where observations of concern were raised in relation to the adequacy of the risk assessments.

The most common suggestion for improvement for rehabilitation risk assessments was for licence holders to review the identified risks against the rehabilitation objectives and completion criteria that are required to be submitted in accordance with mandatory requirement 2. Linking the rehabilitation risk assessment to the rehabilitation objectives and completion criteria allowed better identification and management of the risks that may prevent or delay successfully achieving the objectives and completion criteria, and subsequently, the final land use. This provided a more robust framework for managing rehabilitation risks.

3.3.2. Objectives and completion criteria

Mandatory requirement 2 of the code requires the licence holder, not later than 14 days before the commencement of surface disturbing activities, to provide to the Secretary a copy of clear, specific, achievable and measurable rehabilitation objectives and completion criteria (ROCC). For higher risk prospecting operations, a rehabilitation management plan is required to be prepared and submitted with the rehabilitation objectives and completion criteria.

Most licence holders submitted rehabilitation objectives and completion criteria with applications for assessable prospecting operations. There was one non-compliance for failure to submit ROCCs for an exploration drilling program, and one non-compliance for failure to submit a rehabilitation management plan for a higher risk prospecting operation. Official cautions were issued for the breaches.

Typically, the guideline ROCCs were adopted with little amendment. Licence holders need to check the guideline ROCCs before submission to ensure the ROCCs are appropriate for their exploration programs. Rehabilitation sign-off is assessed against the ROCCs, so it is important to be able to meet the completion criteria for sign-off to be achieved.

3.3.3. Rehabilitation monitoring and performance assessment

Mandatory requirement 3 of the code requires the licence holder to develop, implement and complete a rehabilitation program (which included a monitoring program) to rehabilitate disturbed areas to a condition that could support the intended final land use. Mandatory requirement 4 requires the licence holder to commence rehabilitation of a site as soon as reasonably practicable following the completion of activities on that site.

There were no non-compliances or observations of concern related to rehabilitation monitoring. Generally, rehabilitation was commenced shortly after drilling was completed and laboratory results were received. Figures 11 to 16 show examples of rehabilitation completed or in progress for the exploration activities audited.

Figure 11: Rehabilitation in progress on a cut and fill site

Figure 12: Rehabilitation under monitoring

Figure 13: Rehabilitation under monitoring

Figure 14: Rehabilitation under monitoring

Figure 15: Completed rehabilitation of a diamond drill hole

Figure 16: Completed rehabilitation of a diamond drill hole

Licence holders were maintaining a photographic record of rehabilitation activities, and most were documenting rehabilitation monitoring inspections in some form. The most common suggestion for improvement was for licence holders to consider developing and implementing a process for assessing rehabilitation performance against the nominated objectives and completion criteria. This would provide a more robust framework for monitoring and evaluating rehabilitation progress. It would provide evidence to assist with rehabilitation sign-off by demonstrating the objectives and completion criteria were achieved.

3.4. Reporting and other requirements

3.4.1. Annual reporting

Section 163C of the Mining Act, clause 59 of the Mining Regulation and condition 8 of an exploration licence requires the licence holder to submit an activity report annually within one calendar month following grant anniversary date. Annual activity reports were required to be prepared in accordance with the Exploration guideline: Annual activity reporting for prospecting titles.

Annual reporting was generally well managed by licence holders. Annual geoscientific reports and environmental and rehabilitation compliance reports were submitted for the licences audited. Reports were typically prepared in accordance with NSW Resources or Resources Regulator guidelines and templates.

One licence holder was late submitting an environmental and rehabilitation compliance report, but this was due to a misunderstanding with a change in the NSW Resources portal. The annual geoscientific report for the same year was lodged on time.

3.4.2. Native title and exempted areas

Condition 2 of an exploration licence requires the licence holder to obtain the prior written consent of the Minister before carrying out any activities on land on which native title had not been extinguished. Similarly, Section 30 of the Mining Act requires the consent of the Minister before a licence holder undertakes any activities within a State Conservation Area.

Many licence holders were identifying areas on which native title may apply as 'no-go 'areas. This negated the need to undertake the right to negotiate process and obtain consent under condition 2 of an exploration licence. Several licence holders had well developed mapping systems which identified areas on which native title may apply, and this was used during drill hole planning to either avoid the areas or identify where further approval were required. This was identified as a good practice which may benefit other licence holders.

Where exploration activities were undertaken in exempted areas that were not within State Conservation Areas, licence holders had appropriate land access agreements in place with the landowner.

3.4.3. Section 31 written consent

Section 31 of the Mining Act requires the holder of an exploration licence to obtain written consent for activities on lands within 200 metres of a principal place of residence of the person occupying it, within 50 metres of any garden, on which any significant improvement other than improvements used for ancillary mining activities.

One licence holder failed to identify the distances to adjoining properties and the need to obtain written consent from the land holders. A review of drilling data confirmed 5 holes were within 200m of 3 neighbouring dwelling-houses which were used as the principal place of residence.

Several licence holders had addressed this issue by mapping the residences and significant improvements within and adjoining the licence area and mapping a 200 to 300 metre buffer zone around each one. This mapping was used in drill hole planning to clearly identify where further approvals may be required.

3.4.4. Core and sample storage

Clause 65 of the Mining Regulation requires the holder of an authority to, so far as is reasonably practicable, collect, retain and preserve:

- all drill cores remaining after sampling
- characteristic samples of the rock or strata encountered in any drill holes.

All core and samples collected were required to be labelled, stored and managed in a manner that preserved the integrity of the core or samples.

For most licence holders, core and sample storage was well managed. Core and chip sample trays were labelled and stored in either open core yards or covered storage sheds (see Figures 17 to 22). There was one observation of concern raised in relation to core and sample storage where a licence holder was storing core in an open yard where some of that core was showing signs of deterioration.

Figure 17: Example of core tray labelling

Figure 18: Example of core tray labelling

Figure 19: Core storage in a core warehouse

Figure 20: Core storage in an open core yard

Figure 21: Example of chip tray labelling

Figure 22: Example of chip tray storage

If a licence holder wants to dispose of any core or samples, the licence holder must first offer that core or samples to the department. One licence holder was photographing chip trays for each hole, but not all the samples were retained. Samples that were not useful for the licence holder were returned to the designated sump after photographing. This was raised as a non-compliance because the licence holder was disposing of samples without first offering those to the department.

4. Audit findings – Mining sector

There were 9 audits of mines completed against mining lease conditions and the standard conditions of mining leases in Part 2 of Schedule 8A of the Mining Regulation.

There were 7 non-compliance identified. Previous non-compliances dealt with by the Regulator were also identified. Two of the mines audited comprised more than one mining lease. The lease holders for these mines requested the multiple leases be treated as a single lease for the purposes of Schedule 8A. In each case, this was approved by the Regulator under the provisions of clause 3 of Schedule 8A.

4.1. Environmental management

Clause 4 of Schedule 8A requires a lease holder to prevent, or if that is not reasonably practicable, minimise any harm to the environment arising from activities carried out under the mining leases.

There were no non-compliances relating to environmental management. There were 10 observations of concern across 4 mine sites where there was potential for environmental incidents to occur if action was not taken to address the issues identified. These issues included:

- Lack of controls to protect cultural heritage items
- Poor management and bunding of chemicals, fuels and oils (Figure 23)
- Poor management of pyrite materials on site
- Lack of secondary containment for dirty water and discharge direct to land
- Several instances of land instability, leading to erosion and sedimentation (Figure 24)
- Poor installation of erosion and sediment controls.

All these issues have potential to adversely affect the success of future rehabilitation of sites.

Figures 25 to 28 show examples of good environmental management practices observed on site.

Figure 23: Unbunded chemicals

Figure 24: Example of land instability

Figure 25: Bunded and covered chemical storage

Figure 26: Well-maintained sediment pond

Figure 27: Stockpiling of timber habitat resources for use during rehabilitation

Figure 28: Hydromulched rehabilitation area with habitat resources respread

4.2. Rehabilitation management plan

Clause 5 of Schedule 8A requires rehabilitation to occur as soon as reasonably practicable after disturbance. Clause 10 requires the lease holder of a large mine to prepare and implement a rehabilitation management plan to describe the management of all aspects of rehabilitation of the mining area. Clause 9 requires documents to be prepared in a form approved by the Secretary and include any matter required to be included by the form. The approved form for rehabilitation management plans was documented in the Regulator publication Form and way: Rehabilitation management plan for large mines. Rehabilitation management plans were not required to be submitted to the Regulator but were required to be made publicly available in accordance with the requirements of Clause 16 of Schedule 8A.

All large mines audited in 2025 prepared a rehabilitation management plan in the form and way specified. There were no non-compliances or observations of concern related to rehabilitation management plans. There were suggestions for improvement to improve the rehabilitation management framework at two mines. These suggestions related to:

- Reviewing and updating the rehabilitation management plan following updates to the mine rehabilitation risk assessment.
- Identifying all development consent requirements for rehabilitation and final land use.

4.3. Risk assessment

Clause 7 of Schedule 8A requires the lease holder to conduct a risk assessment to identify, assess and evaluate the risks that need to be addressed to achieve the rehabilitation objectives, completion criteria and final land use. The risk assessment was required to identify the measures to be implemented to eliminate, minimise or mitigate the risks.

All mines audited in 2025 conducted a rehabilitation risk assessment to identify, assess and evaluate the risks that need to be addressed to achieve the rehabilitation objectives, completion criteria and final land use. A summary of the risk assessment was included in the rehabilitation management plan for each mine.

There were observations of concern related to rehabilitation risk assessments at 3 of the mines audited. These included:

- The risk assessment did not reflect the operational status of the mine and needed to be updated; actions were assigned to personnel no longer working at the mine.
- The risk assessment was relying on the risk assessment from the former mining operations plan which did not reflect the risks associated with successfully achieving the approved rehabilitation objectives and/or completion criteria.
- A summary of the rehabilitation risk assessment was included in the rehabilitation management plan but there were no details or records of the actual risk assessment.

As with rehabilitation risk assessments required under the Exploration code of practice: Rehabilitation, referencing the rehabilitation objectives and the final land use in the development of the risk assessment should result in a more robust framework for managing risks associated with rehabilitation of mining operations.

4.4. Rehabilitation outcome documents

Clause 12 of Schedule 8A requires a lease holder to prepare the following documents for the mining lease and give them to the Secretary for approval:

- A rehabilitation objectives statement that sets out the rehabilitation objectives required to achieve the final land use.
- A rehabilitation completion criteria statement that sets out criteria, the completion of which would demonstrate the achievement of the rehabilitation objectives.
- A final landform and rehabilitation plan for large mines showing a spatial depiction of the final land use.

In accordance with the requirements of clause 9, the requirements for the rehabilitation outcome documents were specified in the following Regulator documents:

- Form and way: Rehabilitation objectives and rehabilitation completion criteria for small mines.
- Form and way: Rehabilitation objectives, rehabilitation completion criteria and final landform and rehabilitation plan for large mines.

All mines audited had rehabilitation outcome documents submitted in the approved form and way. Large mines submitted a final land use and rehabilitation plan. This was not required for small mines. There were no observations of concern or suggestions for improvement related to rehabilitation outcome documents.

4.5. Forward program and annual rehabilitation report

Clause 13 of Schedule 8A requires a lease holder to prepare a forward program for the mining lease that includes a schedule of mining activities, and a summary of the spatial progression of rehabilitation through its various phases for the mining area for the next 3 years. An annual rehabilitation report is required to be prepared that includes a:

- description of rehabilitation undertaken over the annual reporting period
- report demonstrating the progress made through the phases of rehabilitation provided in the forward program
- report demonstrating progress made towards achieving the rehabilitation outcomes approved for the mine.

In accordance with the requirements of clause 9, the requirements for the annual rehabilitation reports and forward program were specified in the following Regulator documents:

- Form and way: Annual rehabilitation report and forward program for small mines
- Form and way: Annual rehabilitation report and forward program for large mines.

Lease holders generally prepared and submitted forward programs and annual rehabilitation reports in the approved form and way.

Clause 15 of Schedule 8A requires the lease holder to prepare and submit the forward program and annual rehabilitation report within 60 days after the last day of each reporting period or a later date approved by the Secretary. There were issues around the timing of submission of forward programs and reports. Two non-compliances and one observation of concern were identified in relation to the submission and/or content of annual reports and forward programs. Lease holders should consider the development of systems and processes to track reporting dates and alert when due dates are upcoming.

4.6. Documents to be publicly available

Clause 16 of Schedule 8A requires the lease holder to make certain documents publicly available, either by publishing the documents on its website, or by providing copies upon written request. The documents required to be publicly available include:

- a rehabilitation management plan
- a forward program
- an annual rehabilitation report.

Most leaseholders published the required documents on a website or made them publicly available upon request. There was one non-compliance for failure to publish documents on the titleholder's website. An official caution was issued for the non-compliance.

4.7. Nominated contact persons

Clause 19 of Schedule 8A requires a lease holder to nominate a natural person to be the contact person with whom the Secretary can communicate in relation to the mining lease for the purposes of the Mining Act.

Nominated contact persons were nominated for each mine audited. There were no no-compliances in relation to nominated contact persons. There were 3 suggestions for improvement related to nominated contacts receiving information by email.

Leaseholders are reminded of the obligation to keep the nominated contact details up to date using the forms in the Regulator portal. A new form MUST be submitted within 28 days after a change occurs, including any change to the nominated person's contact details (phone number, postal address and email address).

4.8. Assessable prospecting operations

Condition 4 of a mining lease requires the leaseholder to have development consent or the prior written approval of the Minister before carrying out any assessable prospecting operations on the lease area.

Not all lease holders audited conducted exploration operations on the mining leases. For mines where assessable prospecting operations were conducted, appropriate approvals were in place for those exploration activities.

Where applications for assessable prospecting operations were approved for exploration on mining leases, the activities were generally observed to be conducted in accordance with those approvals.

4.9. Annual geoscientific reporting

Section 163C of the Mining Act and clause 59 of the Mining Regulation requires the preparation and submission of an annual report that provides full particulars of all exploration and other operations or activities conducted during the 12-month period.

There were 3 non-compliances for failure to submit annual geoscientific reporting in accordance with section 163C of the Act and clause 59 of the Mining Regulation. In all 3 cases, the lease holder did not undertake exploration activities. Official cautions were issued for the non-compliances.

Lease holders are reminded of the need to prepare and submit annual geoscientific exploration reports, including nil reports where exploration activities were not undertaken.

4.10. Suspension of operations

Clause 7A of Schedule 1B of the Mining Act states the holder of a lease may suspend mining operations in the mining area only if the operations are suspended in accordance with the written consent of the decision-maker.

There was one non-compliance for failing to seek written consent prior to suspending mining operations. The mining operation was a very small intermittent operation that had been dormant for over 12 months. The lease holder rectified the non-compliance by applying for suspension which was approved by NSW Resources. No further enforcement action was taken by the Regulator.

5. Compliance management

Achieving and maintaining compliance requires proactive management. Lease and licence holders who identified and actively managed their compliance obligations generally had a lower incidence of non-compliance.

The audits of exploration licences and mining leases generally found that higher levels of compliance were achieved if licence or lease holders identified and were actively managing their compliance obligations within some form of compliance management system. This may have taken the form of a simple Excel spreadsheet or database with hyperlinks to documents and records, or a sophisticated software package that can track and escalate compliance issues.

It was recommended all licence and lease holders consider the development of compliance management tools to assist them to be able to actively manage their compliance obligations. For example, as a starting point, the Regulator developed self-audit checklists for miners and explorers which are available on the NSW Resources website for lease and licence holders to use to assess their own level of compliance.

5.1. Identifying compliance obligations

When undertaking exploration, extraction or production of minerals, licence and lease holders are required to operate in accordance with certain standards and obligations. Identifying compliance obligations is a critical step in the development of an effective compliance management system. Compliance obligations can include:

- regulatory requirements (for example, the Mining Act or Mining Regulation)
- conditions imposed on the grant, renewal, or transfer of mining leases and exploration licences
- exploration activity approvals
- exploration codes of practice

- specific commitments made by the organisation (for example, commitments made in approved exploration activity applications, or commitments made in a rehabilitation management plan prepared under the Schedule 8A requirements).

Once identified, compliance obligations must be reviewed periodically to identify any changes in those obligations (for example, changes in legislation).

Most lease and licence holders identified their compliance requirements. Typically, records were generally maintained to demonstrate compliance. Lease and licence holders typically developed some basic systems and processes for managing compliance obligations. Further development of these systems and processes would be beneficial to provide a robust framework for identifying and managing compliance obligations.

Based on the results of audits conducted, the rate of non-compliance in exploration has decreased over the last few years, suggesting exploration licence holders have increased their awareness of, and are actively managing, their compliance obligations.

5.2. Compliance risk assessment and management

Risk assessment and management involve identifying hazards, assessing and controlling risks, and reviewing control measures. A risk assessment can be used to work out:

- the severity of a risk
- what action should be taken to control the risk
- how urgently action is needed.

Risk assessments were a mandatory requirement across both the exploration and mining sectors as follows:

- Community consultation code – mandatory requirement 1.
- Environmental management code – mandatory requirement 12.1
- Rehabilitation code – mandatory requirement 1
- Schedule 8A of the Mining Regulation– Clause 7 Rehabilitation risk assessment

An effective inspection, monitoring and evaluation process is required to:

- monitor the implementation of the risk controls
- evaluate the effectiveness of those controls based on an assessment of inspection and monitoring data
- implement an adaptive management approach if monitoring shows that controls may be ineffective.

The quality of risk assessments completed by lease and licence holders varied widely. There were some good examples sighted during audits but generally, this was an area where further improvements were required.

There were 41 suggestions for improvement identified in relation to risk assessment and management. About half of those suggestions for improvement related to the evaluation of risk controls. Risk assessments should not be viewed as static documents. Lease and licence holders must monitor the implementation of risk controls and undertake an evaluation of the monitoring results to determine the effectiveness of the controls. Where controls are identified as being not effective in addressing the risk, revised controls must be implemented and risk assessments updated.

5.3. Contractor management

Contractors are often used to undertake specialist tasks, for example, exploration drilling. The responsibility of compliance or the implementation of environmental controls is often passed to the contractor, but the licence holder retains accountability for compliance with its lease or licence conditions and other compliance obligations. It is important that the lease or licence holder exercises management control of its contractors; for example, by specifying contract requirements, providing oversight of contracted works, and evaluating the performance of the contractor during the contracted works.

Contractors were most used in exploration for drilling or geophysical activities. Most explorers established systems and processes to manage any contracted activities. Examples of systems and processes observed during audits include:

- development of detailed drilling plans for each hole – these plans included details on the depth, angle, and diameter of the hole, any specific requirements for environmental management, and any other relevant details related to the hole. The plans were typically given to the drillers for reference.
- drilling and/or environmental requirements in contract specification documents, including review of any contractor safety and environmental management systems.
- hazard or risk assessments with the drilling contractor and site inductions with drillers personnel.

For the audits completed in the mining sector, few were using contractors for operational activities. Given the low number of audits completed in the mining sector in 2025, there were no issues of concern or suggestions for improvement related to contractor management.

5.4. Record keeping

Sections 163D and 163E of the Mining Act relate to the creation and maintenance of records required under the Act, the regulations, or a condition of title. Clause 17 of Schedule 8A of the Mining Regulation requires the holder of a mining lease to create and maintain records of all actions taken that demonstrate compliance with the requirements of Schedule 8A conditions. Records must be kept in a legible form for production to any inspector and must be maintained for a period of 4 years after the expiry or cancellation of the title.

Specific requirements for the types of records to be maintained for exploration activities are detailed in the mandatory requirements of the exploration codes of practice as follows:

- mandatory requirement 6 of the Rehabilitation code
- mandatory requirement 13.1 of the Environmental management code
- mandatory requirement 5 of the Community consultation code.

Lease and licence holders need to make themselves aware of the records required to be created and maintained during their operations. Any records created must be readily retrievable upon request from an inspector, so it is important that documents are well organised and maintained.

Generally, most lease and licence holders collated and maintained records as required to demonstrate compliance. There were 9 suggestions for improvement relating to records management, mostly in the exploration sector.

The key suggestion for improvement for explorers related to documenting the lifecycle of each drill hole or other exploration activity. Most explorers had drilling databases to record geological logging, sample analysis and other data for each hole. It was suggested explorers review the information contained in drilling databases to include information that would link each hole to its approval number and include a date and reference for rehabilitation sign-off from the Regulator. The inclusion of records for date drilled and the date rehabilitation was commenced and completed would provide evidence of rehabilitation commencement as soon as reasonably practicable, in accordance with mandatory requirement 4 of the Exploration code of practice: Rehabilitation.

6. Summary and recommendations

The 2025 compliance audit program completed 89 audits across the mining and exploration sectors. Where non-compliances were identified, enforcement action was undertaken that resulted in 16 official cautions being issued to lease or licence holders.

There was a need for all lease and licence holders to identify and understand their compliance obligations and actively manage those obligations to prevent non-compliances occurring. Where lease and licence holders identified and were actively managing their compliance obligations, the audits generally reported much lower levels of non-compliance or observations of concern.

Key recommendations for lease and licence holders to consider arising from the 2025 compliance audit program were similar to those identified in earlier programs. These included:

- General recommendations
  - Lease and licence holders should review their compliance obligations and develop some form of compliance management tool to assist in managing those obligations.
  - Where contractors are used in operations, lease and licence holders need to manage those contractors to ensure contract operations do not compromise the ability of the lease or licence holder to meet their compliance obligations.
  - Risk assessments should not be static documents. All risk assessments should be reviewed regularly to monitor for changes to the risk profile. Similarly, all risk controls should be monitored to confirm implementation, and the effectiveness of the control in mitigating the identified risk.
- Exploration sector
  - The Community consultation code was reviewed and revised in November 2025 following evaluation of audit findings and feedback from industry. Implementation of the revised code should provide improved mandatory requirements and better guidance to licence holders to address the non-compliances and observations of concern raised during exploration audits over the last few years.
  - For environmental risk assessments, licence holders should align their environmental risk assessments to the mandatory elements of the Environmental management code to provide a robust framework for identifying and managing environmental risks.

  - Some explorers were using generic risk assessments for exploration with site specific risks and controls identified in applications for assessable prospecting operations. Splitting risk identification, assessment and management over several documents increases the potential for controls to be missed. Licence holders should consider reviewing the generic risk assessments for each exploration program and consolidating any risks or controls specific to that program into the one document.
  - The most common suggestion for improvement for rehabilitation risk assessments was for licence holders to review the identified risks against the ROCCs that are required to be submitted in accordance with mandatory requirement 2 of the rehabilitation code. Linking the rehabilitation risk assessment to the ROCCs allowed better identification and management of the risks that may prevent or delay successfully achieving the objectives and completion criteria, and subsequently, the final land use. This provided a more robust framework for managing rehabilitation risks.
  - Where explorers were using the guideline ROCCs with little or no amendment, licence holders should be reviewing the guideline ROCCs before submission to ensure the ROCCs are appropriate for the exploration program and can be achieved.
  - Licence holders should consider developing and implementing processes for assessing rehabilitation performance against the nominated objectives and completion criteria. This would provide a more robust framework for monitoring and evaluating rehabilitation progress. It would provide evidence to assist with rehabilitation sign-off by demonstrating the objectives and completion criteria were achieved.
  - Several licence holders had well developed mapping systems which identified areas on which native title may apply, and this was used during drill hole planning to either avoid the areas or identify where further approval is required. This was identified as a good practice which may benefit other licence holders.
  - Most explorers had drilling databases to record geological logging, sample analysis and other data for each hole. It was suggested explorers review the information contained in drilling databases to include information that would link each hole to its approval number and include a date and reference for rehabilitation sign-off from the Regulator. The inclusion of records for date drilled and the date rehabilitation was commenced and completed would provide evidence of rehabilitation commencement as soon as reasonably practicable, in accordance with mandatory requirement 4 of the Rehabilitation code.
- Mining sector
  - As with rehabilitation risk assessments required under the Rehabilitation code, referencing the rehabilitation objectives and the final land use in the development of the risk assessment should result in a more robust framework for managing risks associated with rehabilitation of mining operations.
  - Lease holders should consider the development of systems and processes to track reporting dates and alert when due dates are upcoming.
  - Leaseholders are reminded of the obligation to keep the nominated contact details up to date using the forms in the Regulator portal.

- Lease holders are reminded of the need to prepare and submit annual geoscientific exploration reports, including nil reports where exploration activities were not undertaken.

Appendix 1

Table 4. Summary of audits completed under the 2025 compliance audit program

Mine/project	Titleholder	Title/s	Audit scope
Bald Hill Gold Mine	RTI Mining Pty Ltd	ML1035 (1973)	Mining compliance including Schedule 8A
Lynton Limestone Quarry	Ezy Lime Pty Ltd	ML1568 (1992)	Mining compliance including Schedule 8A
Escott Zeolite Mine	Zeolite Australia Pty Ltd	ML1356(1992)	Mining compliance including Schedule 8A
Clarence Colliery	Coalex Pty Ltd Clarence Coal Investments Pty Ltd	5 titles treated as a single lease	Mining compliance including Schedule 8A
Buckaroo Mine	RK Murdoch Pty Ltd	ML919 (1973)	Mining compliance including Schedule 8A
Paxtons Mine	Macapika Pty Ltd	ML1530 (1992)	Mining compliance including Schedule 8A
Swamp Oak Sapphire Mine	Kenneth Dawson and others	M(MO)L10 (1992)	Mining compliance including Schedule 8A
Wonawinta Mine	Manuka Resources Limited	ML1659 (1992)	Mining compliance including Schedule 8A
Hillgrove Mines	Hillgrove Mines Pty Ltd	47 titles treated as a single lease	Mining compliance including Schedule 8A
Muswellbrook Project	Ridgelands Coal Pty Ltd	EL8064 (1992)	Exploration compliance
Nymagee Mine Project	Nymagee Resources Pty Ltd	EL4458 (1992)	Exploration compliance
Yellow Mountain Project	Ochre Resources Pty Ltd	EL8356 (1992)	Exploration compliance
Maules Creek Project	Aston Coal No. 2 Pty Ltd	AUTH346 (1973)	Exploration compliance
Magwood Project	Lode Metals Pty Ltd	EL9662 (1992)	Exploration compliance
Halls Peak Project	Golden Plateau Pty Ltd	EL9293 (1992)	Exploration compliance
Smiths Tank Project	Manuka Resources Pty Ltd	EL7345 (1992)	Exploration compliance

Mine/project	Titleholder	Title/s	Audit scope
McPhillamys Gold Project	LFB Resources Pty Ltd	EL5760 (1992), EL6111 (1992)	Exploration compliance
Queenslander Project	Fortius Mines Pty Ltd	EL7423 (1992)	Exploration compliance
Currajong and Murga North Projects	Rimfire Pacific Mining Pty Ltd	EL8935 (1992)	Exploration compliance
Bowdens Silver Project	Bowdens Silver Pty Ltd	EL5920 (1992), EL8403 (1992)	Exploration compliance
Kooranjie Project	Magnet Exploration Pty Ltd	EL9264 (1992)	Exploration compliance
Webbs Consols Project	Lode Resources Pty Ltd	EL8933 (1992)	Exploration compliance
West Wyalong Gold Project	Weddarla Pty Ltd	EL8815 (1992)	Exploration compliance
Cowal Project	Evolution Mining (Cowal) Pty Ltd	EL7750 (1992)	Exploration Compliance
The Havilah Project	Extract Minerals Pty Ltd	EL8936 (1992)	Exploration Compliance
Nyngan Project	Kincora Copper Pty Ltd	EL8929 (1992)	Exploration Compliance
McKellar Project	Cobar Minerals Pty Ltd	EL8725 (1992)	Exploration Compliance
Sherwood and Euston Projects	Iluka Resources Pty Ltd	EL9381 (1992), EL9530 (1992)	Exploration Compliance
Copi Project	RZ Resources Pty Ltd	EL8312 (1992), EL9496 (1992)	Exploration Compliance
Gienart Project	Australian Consolidated Gold Holdings Pty Ltd	EL8771 (1992)	Exploration – Community consultation
Myamley Project	Haverford Holdings Pty Ltd	EL8615 (1992)	Exploration – Community consultation
Gulf Creek Copper Project	Gulf Creek Copper Pty Ltd	EL8492 (1992)	Exploration – Community consultation
Basin Creek Project	TRK Resources Pty Ltd	EL8939 (1992)	Exploration – Community consultation
Kempfield Project	Argent (Kempfield) Pty Ltd	AL36 (1992)	Exploration – Community consultation

Mine/project	Titleholder	Title/s	Audit scope
Beanbah Project	Peel Mining Limited	EL8450 (1992)	Exploration – Community consultation
Parkes Project	Agricultural Equity Investments Pty Ltd	EL7242 (1992)	Exploration – Community consultation
Lyell and Burge Trig Project	Defiance Resources Pty Ltd	EL7524 (1992)	Exploration – Community consultation
Genaran Project	FMG Resources Pty Ltd	EL8886 (1992)	Exploration – Community consultation
Tibooburra Project	Awati Resources Pty Ltd	EL9202 (1992)	Exploration – Community consultation
Bygoo North Trewilga Project	Riverston Tin Pty Ltd	EL8620 (1992)	Exploration – Community consultation
Cuttaburra Project	Starlight Exploration Pty Ltd	EL9190 (1992)	Exploration – Community consultation
Trewilga Project	Sandfire Resources Limited	EL8173 (1992)	Exploration – Community consultation
Tomingley Project	Alkane Resources Limited	EL6085 (1992)	Exploration – Community consultation
Spur Project	Deep Ore Discovery Pty Ltd	EL5238 (1992)	Exploration – Community consultation
Mt Thorley Project	Mount Thorley Operations Pty Ltd	EL8824 (1992)	Exploration – Community consultation
Kitsons Project	Graymont (NSW) Pty Ltd	EL9192 (1992)	Exploration – Community consultation
Sherwood Project	Iluka Resources Limited	EL9380 (1992)	Exploration – Community consultation
Willow Glen Project	Magnet Exploration Pty Ltd	EL9166 (1992)	Exploration – Community consultation
Western Exploration Area Project	Endeavour Coal Pty Ltd	EL8972 (1992)	Exploration – Community consultation
Mee Mar and Bauloora Mine Projects	Legacy Minerals Pty Ltd	EL8994 (1992)	Exploration – Community consultation
Hunter Valley Operations Project	Anotero Pty Ltd	EL8821 (1992)	Exploration – Community consultation
Junee Project	Newmont Exploration Pty Ltd	EL8470 (1992)	Exploration – Community consultation

Mine/project	Titleholder	Title/s	Audit scope
Mt Gilmore Project	Mt Gilmore Resources Pty Ltd	EL8379 (1992)	Exploration – Community consultation
Warrajong Sapphire Project	Wade Jeffery Marcus	EL9005 (1992)	Exploration – Community consultation
Mt George Project	Mineral Carbonation International Pty Ltd	EL9479 (1992)	Exploration – Community consultation
Toorang Project	PS & GF Forwood Pty Ltd	EL9301 (1992)	Exploration – Community consultation
Back Creek Project	St Barbara Limited	EL8214 (1992)	Exploration – Community consultation
Boona Gap Project	SRL Ops Pty Ltd	EL8833 (1992)	Exploration – Community consultation
Sir Lancelot Project	Peak Gold Mines Pty Ltd	EL7355 (1992)	Exploration – Community consultation
Halo Project	Metallurgical Refining and Development Pty Ltd	EL9354 (1992)	Exploration – Risk assessment
Albert Project	Cobalt Prospecting Pty Ltd	EL8666 (1992)	Exploration – Risk assessment
Canonba North Project	Australian Consolidated Gold Holdings Pty Ltd	EL8848 (1992)	Exploration – Risk assessment
Appin Project	Illawarra Coal Holdings Pty Ltd	AUTH248 (1973)	Exploration – Risk assessment
Fosters Valley Project	Omya Australia Pty Ltd	EL9331 (1992)	Exploration – Risk assessment
Tainui Project	Iluka Resources Ltd	AL31 (1992)	Exploration – Risk assessment
Gilmore Project	Linq Minerals Limited	EL6845 (1992), EL5864 (1992)	Exploration – Risk assessment
Nombinnie Project	Peel Mining Limited	EL8751 (1992), EL6695 (1992)	Exploration – Risk assessment
Cuttaburra Project	Starlight Exploration Pty Ltd	EL9190 (1992)	Exploration – Risk assessment
Durnings Project	Haverford Holdings Pty Ltd	EL8680 (1992)	Exploration – Risk assessment
Quanda North Project	Oxley Exploration Pty Ltd	EL7438 (1992)	Exploration – Risk assessment

Mine/project	Titleholder	Title/s	Audit scope
Tallebung Tin Project	Stannum Pty Ltd	EL6699 (1992)	Exploration – Risk assessment
Thackaringa Project	Barrier Resources Pty Ltd	EL9353 (1992)	Exploration – Risk assessment
Nymagee Mine Project	Nymagee Resources Pty Ltd	EL4458 (1992)	Exploration – Risk assessment
Melrose Project	Rimfire Pacific Mining Pty Ltd	EL8543 (1992)	Exploration – Risk assessment
Minore Project	Clean Teq Exploration Pty Ltd	EL9031 (1992)	Exploration – Risk assessment
Sunnyside Project	Enmore Gold Pty Ltd	EL8479 (1992)	Exploration – Risk assessment
Mt George Project	Mineral Carbonation International Pty Ltd	EL9479 (1992)	Exploration – Risk assessment
Rose Hill Project	Modeling Resources Pty Ltd	EL6178 (1992)	Exploration – Risk assessment
Northparkes Project	Evolution Mining (Northparkes) Pty Ltd	EL5801 (1992)	Exploration – Risk assessment
Cundumbal Project	Kincora Copper Pty Ltd	EL6661 (1992)	Exploration – Risk assessment
Achilles Project	Australian Gold and Copper Limited	EL8968 (1992)	Exploration – Risk assessment
Crow Mountain Project	Eq Resources Limited	EL6648 (1992)	Exploration – Risk assessment
Browns Reef Project	Eastern Metals Pty Ltd	EL6321 (1992)	Exploration – Risk assessment
Bulla Park Project	Bulla Park Metals Pty Ltd	EL8642 (1992)	Exploration – Risk assessment
Campaspe Project	Murray Basin Titanium Pty Ltd	EL5359 (1992)	Exploration - Rehabilitation
Appin Project	Endeavour Coal Pty Ltd	AUTH396 (1973)	Exploration - Rehabilitation
Rosevale Project	Dong Thi Tran	EL8832 (1992)	Exploration - Rehabilitation
Bungaba Project	Ulan Coal Mines Pty Ltd	EL8687 (1992)	Exploration - Rehabilitation
Mt Arthur Project	Mt Arthur Coal Pty Ltd	AUTH437 (1973)	Exploration - Rehabilitation

Appendix 2

Table 5. Summary of audit findings

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Mining compliance					
Bald Hill Gold Mine	RTI Mining Pty Ltd	ML1035 (1973)	0	2	0
Lynton Limestone Quarry	Ezy Lime Pty Ltd	ML1568 (1992)	1	4	3
Escott Zeolite Mine	Zeolite Australia Pty Ltd	ML1356(1992)	0	0	2
Clarence Colliery	Coalex Pty Ltd	5 titles treated as a single lease	0	2	0
Buckaroo Mine	RK Murdoch Pty Ltd	ML919 (1973)	3	3	4
Paxtons Mine	Macapika Pty Ltd	ML1530 (1992)	0	0	0
Swamp Oak Sapphire Mine	Kenneth Dawson	M(MO)L10	2	1	2
Wonawinta Mine	Manuka Resources Limited	ML1659 (1992)	1	6	3
Hillgrove Mines	Hillgrove Mines Pty Ltd	47 titles treated as a single lease	0	0	2
Mining sub-total			**7**	**20**	**15**

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Exploration compliance					
Muswellbrook Project	Ridgelands Coal Pty Ltd	EL8064 (1992)	0	0	3
Nymagee Mine Project	Nymagee Resources Pty Ltd	EL4458 (1992)	1	0	2
Yellow Mountain Project	Ochre Resources Pty Ltd	EL8356 (1992)	0	0	2
Maules Creek Project	Aston Coal No. 2 Pty Ltd	AUTH346 (1973)	0	0	3
Magwood Project	Lode Metals Pty Ltd	EL9662 (1992)	0	0	4
Halls Peak Project	Golden Plateau Pty Ltd	EL9293 (1992)	0	0	4
Smiths Tank Project	Manuka Resources Pty Ltd	EL7345 (1992)	3	3	4
McPhillamys Gold Project	LFB Resources Pty Ltd	EL5760 (1992), EL6111 (1992)	0	0	0
Queenslander Project	Fortius Mines Pty Ltd	EL7423 (1992)	0	2	1
Currajong and Murga North Projects	Rimfire Pacific Mining Pty Ltd	EL8935 (1992)	0	0	1
Bowdens Silver Project	Bowdens Silver Pty Ltd	EL5920 (1992), EL8403 (1992)	0	0	3
Kooranjie Project	Magnet Exploration Pty Ltd	EL9264 (1992)	0	0	0
Webbs Consols Project	Lode Resources Pty Ltd	EL8933 (1992)	0	2	1
West Wyalong Gold Project	Weddarla Pty Ltd	EL8815 (1992)	2	3	3

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Cowal Project	Evolution Mining (Cowal) Pty Ltd	EL7750 (1992)	0	0	1
The Havilah Project	Extract Minerals Pty Ltd	EL8936 (1992)	0	0	1
Nyngan Project	Kincora Copper Pty Ltd	EL8929 (1992)	0	1	5
McKellar Project	Cobar Minerals Pty Ltd	EL8725 (1992)	0	0	2
Sherwood and Ki Downs Projects	Iluka Resources Pty Ltd	EL9381 (1992), EL9530 (1992)	1	0	1
Copi Project	RZ Resources Pty Ltd	EL8312 (1992), EL9496 (1992)	0	1	5
Exploration compliance sub-total			**7**	**12**	**46**

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Exploration – community consultation					
Gienart Project	Australian Consolidated Gold Holdings Pty Ltd	EL8771 (1992)	0	0	0
Myamley Project	Haverford Holdings Pty Ltd	EL8615 (1992)	0	0	0
Gulf Creek Copper Project	Gulf Creek Copper Pty Ltd	EL8492 (1992)	0	0	0
Basin Creek Project	TRK Resources Pty Ltd	EL8939 (1992)	0	0	0
Kempfield Project	Argent (Kempfield) Pty Ltd	AL36 (1992)	0	1	0
Beanbah Project	Peel Mining Limited	EL8450 (1992)	0	0	0
Parkes Project	Agricultural Equity Investments Pty Ltd	EL7242 (1992)	0	0	0
Lyell and Burge Trig Project	Defiance Resources Pty Ltd	EL7524 (1992)	0	0	0
Genaran Project	FMG Resources Pty Ltd	EL8886 (1992)	0	0	0
Tibooburra Project	Awati Resources Pty Ltd	EL9202 (1992)	0	0	1
Bygoo North Trewilga Project	Riverston Tin Pty Ltd	EL8620 (1992)	0	0	0
Cuttaburra Project	Starlight Exploration Pty Ltd	EL9190 (1992)	0	0	0
Trewilga Project	Sandfire Resources Limited	EL8173 (1992)	0	0	0

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Tomingley Project	Alkane Resources Limited	EL6085 (1992)	0	1	1
Spur Project	Deep Ore Discovery Pty Ltd	EL5238 (1992)	0	0	0
Mt Thorley Project	Mount Thorley Operations Pty Ltd	EL8824 (1992)	0	0	1
Kitsons Project	Graymont (NSW) Pty Ltd	EL9192 (1992)	2	0	0
Sherwood Project	Iluka Resources Limited	EL9380 (1992)	0	0	0
Willow Glen Project	Magnet Exploration Pty Ltd	EL9166 (1992)	0	0	3
Western Exploration Area Project	Endeavour Coal Pty Ltd	EL8972 (1992)	0	0	0
Mee Mar and Bauloora Mine Projects	Legacy Minerals Pty Ltd	EL8994 (1992)	0	0	2
Hunter Valley Operations Project	Anotero Pty Ltd	EL8821 (1992)	0	0	3
Junee Project	Newmont Exploration Pty Ltd	EL8470 (1992)	0	0	2
Mt Gilmore Project	Mt Gilmore Resources Pty Ltd	EL8379 (1992)	0	0	3
Warrajong Sapphire Project	Wade Jeffery Marcus	EL9005 (1992)	1	0	0
Mt George Project	Mineral Carbonation International Pty Ltd	EL9479 (1992)	0	0	2

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Toorang Project	PS & GF Forwood Pty Ltd	EL9301 (1992)	1	2	0
Back Creek Project	St Barbara Limited	EL8214 (1992)	0	0	2
Boona Gap Project	SRL Ops Pty Ltd	EL8833 (1992)	0	0	0
Sir Lancelot Project	Peak Gold Mines Pty Ltd	EL7355 (1992)	0	0	2
Exploration – community consultation sub-total			**4**	**4**	**22**

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Exploration – risk assessment					
Halo Project	Metallurgical Refining and Development Pty Ltd	EL9354 (1992)	0	0	1
Albert Project	Cobalt Prospecting Pty Ltd	EL8666 (1992)	0	0	0
Canonba North Project	Australian Consolidated Gold Holdings Pty Ltd	EL8848 (1992)	0	0	1
Appin Project	Illawarra Coal Holdings Pty Ltd	AUTH248 (1973)	0	0	1
Fosters Valley Project	Omya Australia Pty Ltd	EL9331 (1992)	0	0	2
Tainui Project	Iluka Resources Ltd	AL31 (1992)	0	0	0
Gilmore Project	Linq Minerals Limited	EL6845 (1992), EL5864 (1992)	0	0	3
Nombinnie Project	Peel Mining Limited	EL8751 (1992), EL6695 (1992)	0	0	1
Cuttaburra Project	Starlight Exploration Pty Ltd	EL9190 (1992)	0	0	1
Durnings Project	Haverford Holdings Pty Ltd	EL8680 (1992)	0	0	0
Quanda North Project	Oxley Exploration Pty Ltd	EL7438 (1992)	0	0	1
Tallebung Tin Project	Stannum Pty Ltd	EL6699 (1992)	0	0	0

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Thackaringa Project	Barrier Resources Pty Ltd	EL9353 (1992)	1	0	2
Nymagee Mine Project	Nymagee Resources Pty Ltd	EL4458 (1992)	0	0	0
Melrose Project	Rimfire Pacific Mining Pty Ltd	EL8543 (1992)	0	0	3
Minore Project	Clean Teq Exploration Pty Ltd	EL9031 (1992)	0	0	1
Sunnyside Project	Enmore Gold Pty Ltd	EL8479 (1992)	0	0	2
Mt George Project	Mineral Carbonation International Pty Ltd	EL9479 (1992)	0	0	3
Rose Hill Project	Modeling Resources Pty Ltd	EL6178 (1992)	0	0	0
Northparkes Project	Evolution Mining (Northparkes) Pty Ltd	EL5801 (1992)	0	0	1
Cundumbal Project	Kincora Copper Pty Ltd	EL6661 (1992)	0	0	1
Achilles Project	Australian Gold and Copper Limited	EL8968 (1992)	0	0	3
Crow Mountain Project	Eq Resources Limited	EL6648 (1992)	0	0	2
Browns Reef Project	Eastern Metals Pty Ltd	EL6321 (1992)	0	2	1
Bulla Park Project	Bulla Park Metals Pty Ltd	EL8642 (1992)	0	0	3
Exploration – risk assessment sub-total			**1**	**2**	**33**

Mine/ project	Titleholder	Title	Non-compliances	Observations of concern	Suggestions for improvement
Exploration – rehabilitation completion					
Campaspe Project	Murray Basin Titanium Pty Ltd	EL5359 (1992)	1	1	0
Appin Project	Endeavour Coal Pty Ltd	AUTH396 (1973)	0	0	1
Rosevale Project	Dong Thi Tran	EL8832 (1992)	0	2	0
Bungaba Project	Ulan Coal Mines Pty Ltd	EL8687 (1992)	0	0	0
Mt Arthur Project	Mt Arthur Coal Pty Ltd	AUTH437 (1973)	0	0	0
Exploration – rehabilitation completion sub-total			**1**	**3**	**1**
Overall total			**20**	**41**	**117**